



EDWARD S. WEISFELNER
direct dial: (212) 209-4900
fax: (212) 209-4801
eweisfelner@brownrudnick.com

Seven
Times
Square
New York
New York
10036
tel 212.209.4800
fax 212.209.4801

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VIA EMAIL AND ECF FILING

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

RE: In re Motors Liquidation Company, et al., Case No. 09-50026 (MG)

Dear Judge Glenn:

We write on behalf of the Ignition Switch Plaintiffs, certain Non-Ignition Switch Plaintiffs (together, the “**Economic Loss Plaintiffs**”), certain Pre-Closing Accident Plaintiffs, and the Motors Liquidation Company GUC Trust (the “**GUC Trust**,” together with the Economic Loss Plaintiffs and certain Pre-Closing Accident Plaintiffs, the “**Parties**”), in connection with the Parties’ Settlement Agreement filed with the Court today.

The Economic Loss Plaintiffs have filed *The Economic Loss Plaintiffs’ Motion to: (1) Extend Bankruptcy Rule 7023 to These Proceedings; (2) Approve the Form and Manner of Notice; (3) Grant Class Certification for Settlement Purposes Upon Final Settlement Approval; (4) Appoint Class Representatives and Class Counsel for Settlement Purposes; and (5) Approve the Settlement Agreement by and Among the Signatory Plaintiffs and the GUC Trust Pursuant to Rule 23* [ECF No. 14408], seeking, *inter alia*, approval of the Settlement Agreement under Rule 23. As set forth in the Settlement Agreement, the Pre-Closing Accident Plaintiffs and the GUC Trust support the relief requested in this motion.

The GUC Trust has filed the *Motion of Motors Liquidation Company GUC Trust to Approve (I) the GUC Trust Administrator’s Actions, (II) the Settlement Agreement By and Among the Signatory Plaintiffs and the GUC Trust Pursuant to Bankruptcy Code Sections 105, 363, and 1142 and Bankruptcy Rules 3002, 9014, and 9019, and (III) to Authorize the Reallocation of GUC Trust Assets* [ECF No. 14409], seeking, *inter alia*, approval of the Settlement Agreement under Bankruptcy Rule 9019. The Economic Loss Plaintiffs and Pre-Closing Accident Plaintiffs support the relief requested in this motion.

Previously, the Parties, together with the Pre-Closing Accident Plaintiffs represented by Hilliard Muñoz Gonzales L.L.P., the Law Offices of Thomas J. Henry, and Goodwin Procter LLP (the “**Hilliard/Henry Plaintiffs**”) informed the Court of their on-going settlement negotiations and expressed that they anticipated entering into a new settlement and filing a motion for approval by January 31, 2019. *See Joint Status Letter*, dated Dec. 12, 2018 [ECF No. 14383]. The short delay in this anticipated filing was engendered by the abrupt, last minute refusal last night by the Hilliard/Henry Plaintiffs to execute the Settlement Agreement, for reasons currently unknown. Regardless, the terms of, and expectations under the Settlement Agreement otherwise remain the same, and the Parties stand committed to obtaining Court approval of the Settlement Agreement and the relief requested in the motions referenced above.

Respectfully submitted,

/s/ Edward S. Weisfelner

Edward S. Weisfelner
Howard S. Steel
BROWN RUDNICK LLP
Seven Times Square
New York, New York 10036
Tel: 212-209-4800
eweisfelner@brownrudnick.com
hsteel@brownrudnick.com

Sander L. Esserman
STUTZMAN, BROMBERG, ESSERMAN & PLIFKA,
A PROFESSIONAL CORPORATION
2323 Bryan Street, Ste 2200
Dallas, Texas 75201
Tel: 214-969-4900
esserman@sbep-law.com

*Designated Counsel for the Ignition Switch
Plaintiffs and Certain Non-Ignition Switch
Plaintiffs in the Bankruptcy Court*

Steve W. Berman (admitted pro hac vice)
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, Washington 98101
Tel: 206-623-7292
steve@hbsslaw.com

Elizabeth J. Cabraser
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111
Tel: 414-956-1000
ecabraser@lchb.com

*Co-Lead Counsel for the Ignition Switch
Plaintiffs and Certain Non-Ignition Switch
Plaintiffs in the MDL Court*

Lisa M. Norman (admitted *pro hac vice*)
T. Joshua Judd (admitted *pro hac vice*)
ANDREWS MYERS, P.C.
1885 St. James Place, 15th Floor
Houston, Texas 77056
Tel: 713-850-4200
Lnorman@andrewsmyers.com
Jjudd@andrewsmyers.com

Counsel for Certain Pre-Closing Accident Plaintiffs

Mark Tsukerman
COLE SCHOTZ P.C.
1325 Avenue of Americas, 19th Floor
New York, NY 10019
Tel: 212-752-8000
MTsukerman@coleschotz.com

Counsel for Certain Pre-Closing Accident Plaintiffs

Kristin K. Going
Marita S. Erbeck
DRINKER BIDDLE & REATH LLP
1177 Avenue of the Americas, 41st Floor
New York, New York 10036
Tel: 212-248-3273
kristin.going@dbr.com
marita.erbeck@dbr.com

*Counsel for the Motors Liquidation
Company GUC Trust*

cc: Counsel of Record via CM/ECF